

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**In re: Motion to Compel Compliance with  
Subpoena Directed to Information Technology  
Management Services Inc.**

**Underlying Case**

**Plus One, LLC,**

**Plaintiff,**

**v.**

**Capital Relocation Services LLC,**

**Defendant.**

**Misc. Action No. \_\_\_\_\_**

Case: 1:24-mc-00152  
Assigned To : Jackson, Amy Berman  
Assign. Date : 11/7/2024  
Description: Misc. Case (O-DECK)

**Case No. 23-cv-2016 (KMM/JFD)  
(U.S.D.C. D. Minn.)**

**PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA  
DIRECTED TO NONPARTY INFORMATION TECHNOLOGY  
MANAGEMENT SERVICES INC., AND FOR CONTEMPT SANCTIONS**

Plaintiff in the above-captioned action, through its undersigned counsel, respectfully moves this Court, pursuant to Rules 37 and 45 of the Federal Rules of Civil Procedure, for an order compelling to Information Technology Management Services Inc. ("ITMS") to produce documents in compliance with the third-party subpoena issued to and duly served upon ITMS, to which ITMS has failed to respond and for contempt sanctions.

Plaintiff has attempted to confer with ITMS prior to bringing this motion, but ITMS has failed to respond to Plaintiff's conferral attempts.

This motion is based upon the Memorandum, Declaration, and Exhibits filed together herewith. A proposed order is included with this motion.

Dated: November 7, 2024.

Respectfully submitted,

/s/Charles D. Tobin

Charles D. Tobin (#455593)

**BALLARD SPAHR LLP**

**RECEIVED**

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Clerk, U.S. District & Bankruptcy  
Court for the District of Columbia

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*Attorneys for Plaintiff and Movant  
Plus One Relocation, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of November, 2024, a true and correct copy of the forgoing was served on Information Technology Management Services Inc. via US Mail, first class postage prepaid, and via FedEx next day delivery, to 12019 English Maple Ln, Fairfax, VA 22030 and to 12351 Firestone Ct, Fairfax, VA 22033, and by e-mail as follows:

Hoan Le, President  
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*and*

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/s/ Tasha Hart